

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**WILLIAM A. DePARDO,**  
**Plaintiff**

**v.**

**MFS/SUN LIFE FINANCIAL**  
**DISTRIBUTORS, INC. d/b/a**  
**SUN LIFE OF CANADA and**  
**TAC WORLDWIDE COMPANIES,**  
**Defendants**

**CIVIL ACTION NO.: 04-  
0248DPW**

**ASSENTED TO MOTION OF PLAINTIFF FOR LEAVE TO AMEND**  
**COMPLAINT**

The plaintiff, William A. DePardo, respectfully moves the Court pursuant to Fed. R. Civ. P. 15(a) and 15(b) for leave to amend his Complaint by changing the statement in paragraph 21 of total long-term disability benefits allegedly owed from \$150,022.15 to \$355,780.36 and by changing the statement in paragraph 33 of all benefits (short-term disability, long-term disability and life insurance policy cash value) allegedly owed from \$304,279.69 to \$510,379.90. The proposed Amended Complaint accompanies the present motion.

In support of his motion, the plaintiff states that (1) the amendment is intended to bring the allegations in conformity with applicable provisions within the Group Term Insurance Policy regarding the number of months for which long-term disability payments shall be made and (2) the defendants assent to the proposed amendment.

Respectfully submitted:

The Plaintiff, William A. DePardo,

By his Attorneys,

/s/ Nicholas S. Guerrero  
Nicholas S. Guerrero, BBO# 551475  
Shaheen Guerrero & O'Leary, LLC  
Jefferson Office Park  
820A Turnpike Street  
North Andover, MA 01845  
(978) 689-0800

Dated: July 20, 2004

**CERTIFICATE PURSUANT TO L.R. 7.1(A)(2)**

Counsel hereby certifies that the parties have conferred and assent to the present motion.

Dated: July 20, 2004

/s/ Nicholas S. Guerrero  
Nicholas S. Guerrero

**CERTIFICATE OF SERVICE**

I hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by mail pursuant to Fed. R. Civ. P. 5(a).

Dated: July 20, 2004

/s/ Nicholas S. Guerrero  
Nicholas S. Guerrero